

December 28, 2016

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 518  
New York, New York 10007

**RE: RRKidz, Inc. ("RRKidz") v. Western New York Public Broadcasting Association ("WNED")  
Case No. 1:16-cv-00912-VSB - Joint Letter re: Discovery Deadlines.**

Dear Judge Broderick:

On December 16, 2016, the parties to this action agreed to suspend discovery for two weeks to negotiate the terms of a settlement. After further discussions, the parties agree that additional time is needed to reach a full settlement of all claims and defenses in this action, and to get the necessary approvals for such an agreement. Thus, the parties have agreed—subject to the approval of this Court—to suspend all litigation activity until February 17, 2017 so that the parties can focus on settlement negotiations.

The parties therefore respectfully request that the deadline for the close of discovery (including all written discovery and depositions), which currently is set for January 20, 2017, be re-set to March 24, 2017, with a corresponding adjustment of the date for the post-discovery status conference (currently scheduled for February 15, 2017) and related dates. If the parties are not able to settle the case by February 17, 2017, the parties have agreed that discovery and other litigation activity will resume thereafter, beginning with the deposition of LeVar Burton in New York during the week of February 20, 2017.

The parties wish to thank the Court for its time and attention to this matter.

Very truly yours,

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